

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

RENEE M. BUTZ,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civ. No. 05-495-JJF
	)	Judge Joseph J. Farnan Jr.
LAWNS UNLIMITED LTD. and	)	
EDWARD FLEMING,	)	
	)	
Defendants.	)	

**PLAINTIFF'S RESPONSE TO DEFENDANTS' SECOND SET OF  
INTERROGATORIES DIRECTED TO PLAINTIFF**

**General Responses and Objections**

1. Plaintiff objects to any and all Interrogatories to the extent they seek the disclosure of information or documents protected by the attorney-client privilege and/or work product privilege.
2. Plaintiff objects to any and all Interrogatories to the extent they seek information not relevant to the subject matter of this action and information not reasonably calculated to lead to the discovery of admissible evidence.
3. Plaintiff objects to any and all Interrogatories to the extent they require a response other than as described by FRCP 33.

Each of the responses provided below are subject to the general responses and objections outlined herein. Plaintiff reserves the right to supplement these interrogatories as additional, responsive, non-privileged information becomes available.

**Specific Objections and Responses**

20. Identify all payments you remitted to any health care provider or insurer, including but not limited to, Optimum Choice and Blue Cross Blue Shield, during the period of December 23, 2003 through April 22, 2004, and for each such payment, identify the amount of payment, the payee to whom payment was issued, and describe for what the payment was owed, including but not limited to, a co-pay for services, visits, or treatment by a health care provider, and a premium paid to an insurer.

**RESPONSE:** Plaintiff has previously provided the information requested through Initial Disclosure and through a Settlement offer.

A handwritten signature in cursive script, reading "Renee M. Butz", is written over a horizontal line.

Renee M. Butz  
58 Hickory Drive  
North East, MD 21901  
(410) 441-4300  
Plaintiff pro se

Dated: 5/22/07

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FOR THE DISTRICT OF DELAWARE

RENEE M. BUTZ,

Plaintiff,

V.

LAWNS UNLIMITED LTD. and  
EDWARD FLEMING,


**Defendants.**

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## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Plaintiff's Response to Defendants' Second Set of Interrogatories Directed to Plaintiff were sent by first-class United States mail, postage duly paid, on this 22 day of May, 2007, to counsel of record as follows:

Margaret M. DiBianca  
Young Conaway Stargatt & Taylor, LLP  
The Brandywine Building, 17<sup>th</sup> Floor  
1000 West Street  
Wilmington, DE 19899

  
Renee M. Butz  
58 Hickory Drive  
North East, MD 21901  
(410) 441-4300  
Plaintiff pro se

Dated: 5/22/07

Kenee Post



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USA FIRST-CLASS FOREVER

USA FIRST-CLASS FOREVER

58 Hickory Lane  
Baltimore, MD 21301  
MAY 21 2007

2007 BALTIMORE MD 212



U.S. District Court

Attn: Judge Joseph J. Ferman Jr  
J. Caleb Bogs Federal Building

844 N. King Street  
Wilmington, DE 19801

U.S.M.S.  
X-RAY